

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BETHANN SHANNON,)
Plaintiff,) Case No. 07 CIV 7926 (DLC) (MHB)
v.)
FOCUS FEATURES, LLC and)
UNIVERSAL ENTERTAINMENT)
CORPORATION,)
Defendants.)

mc

**MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Julie Rikelman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's name: David L. Burg
Firm name: NBC Universal, Inc.
Address: 100 Universal City Plaza
Building 1280-6
City/State/Zip: Universal City, California 91608
Phone Number: (818) 777-1856
Fax Number: (818) 866-1999
Email: david.burg@nbcuni.com

David L. Burg is a member in good standing of the Bar of the State of California.

There is no pending disciplinary proceeding against Mr. Burg in any State or Federal court.

632527 # 25
11-14-07
S.D. OF N.Y.
2007 NOV 14 PM 11:51
U.S. DISTRICT COURT
FILED - Clerk

Dated: November 8, 2007

Respectfully submitted,



Julie Rikelman (JR 4888)

30 Rockefeller Plaza
Suite 1011E
New York, New York 10112

Telephone: (212) 664-4167

Fax: (212) 664-6572

Email: julie.rikelman@nbcuni.com

Attorney for Defendant Focus Features LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of November 2007, I caused to be served upon the following individuals by FIRST CLASS U.S. MAIL a true and correct copy of the Motion To Admit Counsel Pro Hac Vice, Affidavit Of Julie Rikelman In Support of Motion To Admit Counsel Pro Hac Vice, and all supporting documents thereto filed by Defendant Focus Features LLC:

Paul C. Rapp, Esq.
348 Long Pond Road
Housatonic, MA 01236

Attorney for Plaintiff.

Julie Rikelman

A handwritten signature in black ink, appearing to read "Julie Rikelman", is written over a horizontal line.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|-------------------------|---|--------------------------------------|
| BETHANN SHANNON, |) | |
| |) | Case No. 07 CIV 7926 (DLC) (MHB) |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| FOCUS FEATURES, LLC and |) | AFFIDAVIT OF JULIE RIKELMAN |
| UNIVERSAL ENTERTAINMENT |) | IN SUPPORT OF MOTION TO ADMIT |
| CORPORATION, |) | COUNSEL <i>PRO HAC VICE</i> |
| |) | |
| Defendants. |) | |
| |) | |

Julie Rikelman, being duly sworn, hereby deposes and says as follows:

1. I am Litigation Counsel for NBC Universal, Inc. and represent Defendant Focus Features LLC in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit David L. Burg as counsel *pro hac vice* to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1999. I also am admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.
3. I have known David L. Burg since October 2006.
4. Mr. Burg is Senior Vice President, Litigation for NBC Universal, Inc. and works at the company's offices in Universal City, California. Defendant Focus Features LLC is indirectly owned by NBC Universal, Inc.
5. I have found Mr. Burg to be a skilled attorney and a person of integrity. I am informed and believe that he is experienced in federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of David L. Burg, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of David L. Burg, *pro hac vice*, which is attached hereto as Exhibit A.

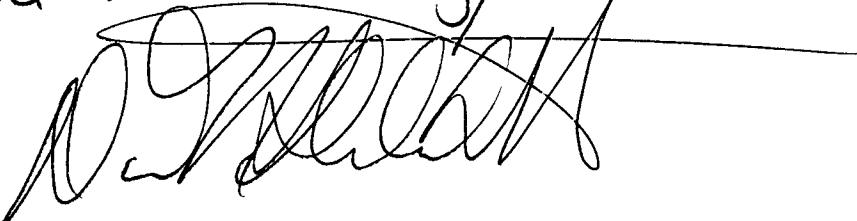
WHEREFORE it is respectfully requested that the motion to admit David L. Burg, *pro hac vice*, to represent Defendant Focus Features LLC in the above captioned matter, be granted.

Dated: November 8, 2007
City, State: New York, New York
Notarized:

Respectfully submitted,


Julie Rikelman (JR 4888)

Sworn to and subscribed
before me this 8th day of November, 2008.



DAVID N. STERNLICHT
Notary Public, State of New York
No. 02ST6050045
Qualified in Westchester County
Commission Expires Oct. 30, 2010



**THE STATE BAR
OF CALIFORNIA**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

MEMBER SERVICES CENTER

TELEPHONE: 888-800-3400

October 17, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, DAVID LOREN BURG, #130403 was admitted to the practice of law in this state by the Supreme Court of California on December 14, 1987; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|-------------------------|---|--------------------------------------------------------------------------|
| BETHANN SHANNON, |) | Case No. 07 CIV 7926 (DLC) (MHB) |
| Plaintiff, |) | |
| v. |) | ORDER FOR ADMISSION <i>PRO HAC VICE</i> ON WRITTEN MOTION |
| FOCUS FEATURES, LLC and |) | |
| UNIVERSAL ENTERTAINMENT |) | |
| CORPORATION, |) | |
| Defendants. |) | |

Upon the motion of Julie Rikelman, attorney for Defendant Focus Features LLC, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's name: David L. Burg
 Firm name: NBC Universal, Inc.
 Address: 100 Universal City Plaza
 Building 1280-6
 City/State/Zip: Universal City, California 91608
 Phone Number: (818) 777-1856
 Fax Number: (818) 866-1999
 Email: david.burg@nbcuni.com

is admitted to practice *pro hac vice* as counsel for Defendant Focus Features LLC in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge